## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI OXFORD DIVISION

ROSIE HUGHES and NANCY CRAWFORD, Individually, and on behalf of themselves and other similarly situated current and former employees,

Plaintiffs,

v.

**HUDDLE HOUSE, INC.,** a Georgia Corporation,

Defendant.

Civil Action No.: 3:17-cv-193-SA-RP

#### JOINT MOTION TO APPROVE SETTLEMENT AGREEMENT

Named Plaintiffs, Rosie Hughes and Nancy Cranford, and Opt In Plaintiffs Marie McKee, Jr'Breda Jones, Margaret Kibbey, and Erica Pitcock (collectively "Plaintiffs"), by and through their undersigned counsel, and Defendant, Huddle House, Inc. ("Huddle House"), by and through its undersigned counsel, file this Joint Motion to Approve Settlement Agreement.

The parties respectfully request that the Court review and approve the terms of the proposed settlement of this action under the Fair Labor Standards Act. The parties also request the Court to approve the proposed apportionment of the settlement proceeds, and the fairness, reasonableness, and adequacy of the proposed settlement.

The grounds for this motion are that the parties have reached an arms-length settlement of this matter after extensive, bona fide negotiations; that the Plaintiffs believe that the proposed settlement is in the best interests of themselves; and that all parties desire to conclude

this matter without further expense, delay, and the uncertainty of continued litigation.

This motion is supported by **Exhibit A** (Settlement Agreement and Release of Claims), to be attached hereto under seal by the Clerk of Court and incorporated by reference<sup>1</sup>, and the accompanying Memorandum of Law.

Dated this 25th day of May, 2018.

Respectfully Submitted,

### s/ George B. Ready

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ATTORNEYS FOR DEFENDANT

<sup>&</sup>lt;sup>1</sup> A Joint Motion to File Confidential Settlement Agreement Under Seal is pending. In the Motion, the parties request that the Settlement Agreement be filed as Exhibit A to this motion under seal.

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of May, 2018, a true and correct copy of the above **JOINT MOTION TO APPROVE CONFIDENTIAL SETTLEMENT AGREEMENT** was served through the Court's ECF notification system upon Plaintiff's counsel of record, listed as follows:

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# **EXHIBIT A**

[To be filed under seal by Clerk of Court following decision on pending Joint Motion to File Confidential Settlement Agreement Under Seal]

4813-1305-8149, v. 3